

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,)	
)	
Plaintiff,)	Civil Action No. 06-726 (JJF)
)	Civil Action No. 07-357 (JJF)
v.)	
)	CONSOLIDATED CASES
CHI MEI OPTOELECTRONICS)	
CORPORATION, et al.)	
)	
Defendants.)	
)	
)	

**CHI MEI OPTOELECTRONICS CORPORATION'S MOTION TO
LIMIT THE NUMBER OF PATENTS-IN-SUIT AND STAY THE REMAINDER**

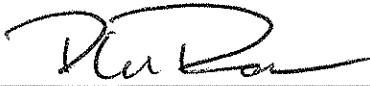
Chi Mei Optoelectronics Corporation ("CMO") moves the Court to exercise its discretion by limiting the number of asserted patents to a manageable number, staying the remainder. In order to allow for manageable claim construction proceedings and streamline the case towards a more focused trial, CMO respectfully requests that the Court limit further proceedings to four patents-in-suit for each party and three claims from each such patent, staying the remaining patents for later trial. CMO's motion is based on the accompanying Opening Brief in Support of Chi Mei Optoelectronics Corporation's Motion to Limit the Number of Patents-in-Suit and Stay the Remainder and the exhibits thereto, the accompanying declaration of Maclain Wells, and the papers, records and pleadings on file with the Court in this case.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Jonathan S. Kagan
Alexander C.D. Giza
Adam Hoffman
Irell & Manella LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
(310) 277-1010

Dated: August 5, 2008
877216

By: 
Philip A. Rovner (#3215)
Hercules Plaza
P.O. Box 951
Wilmington, Delaware 19899-0951
(302) 984-6000
provner@potteranderson.com

*Attorneys for Defendant
Chi Mei Optoelectronics Corporation*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on August 5, 2008, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY CM/ECF, HAND DELIVERY AND E-MAIL

Richard E. Kirk, Esq.
Ashley Blake Stitzer, Esq.
The Bayard Firm
222 Delaware Avenue
Suite 900
P.O. Box 25130
Wilmington, DE 19899
rkirk@bayardfirm.com
astitzer@bayardfirm.com

BY CM/ECF, HAND DELIVERY AND E-MAIL

John W. Shaw, Esq.
Karen L. Pascale, Esq.
Young Conaway Stargatt & Taylor LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
jshaw@ycst.com
kpascale@ycst.com

I hereby certify that on August 5, 2008 I have sent by E-mail the foregoing document to the following non-registered participants:

Gaspare J. Bono, Esq.
Matthew T. Bailey, Esq.
Lora A. Brzezynski, Esq.
Cass W. Christenson, Esq.
R. Tyler Goodwyn, IV, Esq.
McKenna Long & Aldridge LLP
1900 K Street, NW
Washington, DC 20006
gbono@mckennalong.com
mbailey@mckennalong.com
lbrzezynski@mckennalong.com
cchristenson@mckennalong.com
tgoodwyn@mckennalong.com

Vincent K. Yip, Esq.
Peter J. Wied, Esq.
Jay C. Chiu, Esq.
Katherine F. Murray, Esq.
Ms. Denise Esparza
Paul Hastings Janofsky & Walker LLP
515 South Flower Street
Los Angeles, CA 90071
vincentyip@paulhastings.com
peterwied@paulhastings.com
jaychiu@paulhastings.com
katherinemurray@paulhastings.com
deniseesparza@paulhastings.com

Ron E. Shulman, Esq.
Julie M. Holloway, Esq.
Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, CA 94304-1050
rshulman@wsgr.com
jholloway@wsgr.com

M. Craig Tyler, Esq.
Brian D. Range, Esq.
Wilson Sonsini Goodrich & Rosati
8911 Capital of Texas Highway North
Westech 360, Suite 3350
Austin, TX 78759
ctyler@wsgr.com
brange@wsgr.com

/s/ Philip A. Rovner

Philip A. Rovner (#3215)
Potter Anderson & Corroon LLP
Hercules Plaza, 6th Floor
P. O. Box 951
Wilmington, DE 19899
(302) 984-6000
provner@potteranderson.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION, et al.

Defendants.

)
)
)
) Civil Action No. 06-726 (JJF)

) Civil Action No. 07-357 (JJF)

)
) CONSOLIDATED CASES
)
)
)

**NOTICE OF MOTION TO LIMIT THE NUMBER OF PATENTS-IN-SUIT
AND STAY THE REMAINDER**

PLEASE TAKE NOTICE that, Defendant Chi Mei Optoelectronics Corporation will present Chi Mei Optoelectronics Corporation's Motion To Limit The Number Of Patents-In-Suit And Stay The Remainder to the Court on Friday, September 12, 2008 at 10:00 a.m. or on any other date ordered by the Court.

OF COUNSEL:

Jonathan S. Kagan
Alexander C. D. Giza
Adam Hoffman
Irell & Manella LLP
1800 Avenue of the Stars
Los Angeles, CA 90067
(310) 277-1010

Dated: August 5, 2008
877218

POTTER ANDERSON & CORROON LLP

By: 

Philip A. Rovner (#3215)

Hercules Plaza

P. O. Box 951

Wilmington, DE 19899

(302) 984-6000

provner@potteranderson.com

*Attorneys for Defendant
Chi Mei Optoelectronics Corporation*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,)	
)	
Plaintiff,)	Civil Action No. 06-726 (JJF)
)	Civil Action No. 07-357 (JJF)
v.)	
)	CONSOLIDATED CASES
CHI MEI OPTOELECTRONICS)	
CORPORATION, et al.)	
)	
Defendants.)	
)	
)	

**CHI MEI OPTOELECTRONICS CORPORATION'S CERTIFICATION OF COUNSEL
PURSUANT TO LOCAL RULE 7.1.1 REGARDING ITS MOTION TO
LIMIT THE NUMBER OF PATENTS-IN-SUIT AND STAY THE REMAINDER**


Pursuant to Local Rule 7.1.1, I hereby certify that counsel for Chi Mei Optoelectronics Corporation ("CMO") has attempted in good faith to resolve the issues presented in CMO's August 5, 2008 Motion to Limit the Number of Patents-in-Suit and Stay the Remainder. Counsel for CMO, LG Display Co., Ltd., and AU Optronics Corp. ("AUO") have exchanged numerous e-mails and communicated by telephone in an attempt to resolve the issues, with all the parties recognizing the need to reduce the number of elements for construction. *See* Ex. B to CMO's Brief. In a July 28, 2008 e-mail, counsel for AUO wrote that "[h]aving further considered the proposal [to stay certain patents], AUO believes it is too early in the case to take this approach," thereby terminating the parties' negotiations. *See* Ex. C to CMO's brief.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Jonathan S. Kagan
Alexander C.D. Giza
Adam Hoffman
Irell & Manella LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
(310) 277-1010

Dated: August 5, 2008
877217

By: 
Philip A. Rovner (#3215)
Hercules Plaza
P.O. Box 951
Wilmington, Delaware 19899-0951
(302) 984-6000
provner@potteranderson.com

*Attorneys for Defendant
Chi Mei Optoelectronics Corporation*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-726 (JJF)
)	Civil Action No. 07-357 (JJF)
CHI MEI OPTOELECTRONICS)	
CORPORATION, et al.)	
)	CONSOLIDATED CASES
Defendants.)	

[PROPOSED] ORDER

AND NOW, the Court, this _____ day of _____, 2008 upon consideration of Defendant Chi Mei Optoelectronics Corporation's Motion to Limit the Number of Patents-in-Suit and Stay the Remainder, Plaintiff LG Display Co., Ltd.'s and Defendant AU Optoelectronic Corp.'s Oppositions thereto, and related materials, does hereby **ORDER** that:

1. Each party must elect four of its respective patents-in-suit and three claims from each such patent on which to proceed to claim construction and trial.
2. All proceedings relating to the remaining unelected patents are stayed until after the trial on the elected patents.

IT IS SO ORDERED:

The Honorable Joseph J. Farnan, Jr.